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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ZOYA KOVALENKO,

Plaintiff,

V.

KIRKLAND & ELLIS LLP, MICHAEL DE VRIES, MICHAEL W. DE VRIES, P.C., ADAM ALPER, ADAM R. ALPER, P.C., AKSHAY DEORAS, AKSHAY S. DEORAS, P.C., AND MARK FAHEY,

Defendants.

Case No. 4:22-cv-05990-HSG (TSH)

**JOINT ADMINISTRATIVE MOTION TO
PERMIT NON-PUBLIC DISCUSSIONS
DURING APRIL 18, 2025 DISCOVERY
HEARING**

Re: Dkt. No. 215

Assigned to the Honorable Haywood S. Gilliam,
Jr., United States District Judge for the United
States District Court for the Northern District of
California, Oakland Division

Referred to the Honorable Thomas S. Hixson,
United States Magistrate Judge for the United
States District Court for the Northern District of
California, San Francisco Division

Hearing scheduled for April 18, 2025 at 10:00 am, before Judge Hixson, at the San Francisco Courthouse, 15th Floor, Courtroom E, 450 Golden Gate Avenue, San Francisco, California 94102, via Zoom.

1 Pursuant to Civil Local Rule 7-11, Plaintiff Zoya Kovalenko and Defendants Kirkland &
2 Ellis LLP, Michael De Vries, Michael W. De Vries, P.C., Adam Alper, Adam R. Alper, P.C.,
3 Akshay Deoras, Akshay S. Deoras, P.C., and Mark Fahey (collectively, “Defendants”) (Plaintiff
4 and Defendants collectively, the “Parties”) hereby file the instant joint administrative motion
5 requesting the Court permit non-public discussions to the extent it becomes necessary during the
6 discovery hearing scheduled for this Friday, April 18, 2025, at 10:00 am before the Honorable
7 Judge Hixson. *See Clerk’s Not. Setting Zoom Telephonic Disc. Hr’g* (Apr. 15, 2025), Dkt. No. 215
8 (setting discovery hearing for April 18, 2025 as Zoom telephonic conference).

9 As Judge Gilliam noted in his Order dated March 26, 2025, “[t]o the extent the Court
10 determines that any targeted *in camera* discussions are warranted, the Court may utilize Zoom’s
11 ‘breakout room’ function to conduct such discussions.” Order at 2, Dkt. No. 205. The Parties
12 anticipate that *in camera* discussions may be warranted at the April 18 discovery hearing because
13 the subpoena dispute at issue involves confidential information. Kovalenko Decl. ¶¶ 4–6; *U.S.*
14 *E.E.O.C. v. ABM Indus. Inc.*, No. 1:07-cv-01428 LJO JLT, 2010 WL 582049, at *1–2 (E.D. Cal.
15 Feb. 12, 2010). Thus, the Parties respectfully request that, to the extent necessary, the Court grant
16 this Joint Administrative Motion permitting non-public *in-camera* discussions during the hearing.

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JOINT ADMINISTRATIVE MOTION TO PERMIT NON-PUBLIC DISCUSSIONS DURING 4/18/25 DISCOVERY
HEARING
CASE NO. 4:22-cv-05990-HSG (TSH)

1 Dated: April 17, 2025

ZOYA KOVALENKO

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4 By: s/Zoya Kovalenko
5 Zoya Kovalenko
6 *Attorney for Plaintiff Zoya Kovalenko*

7 Dated: April 17, 2025

JOSEPH C. LIBURT
8
9 Orrick, Herrington & Sutcliffe LLP

10 By: /s/ Joseph C. Liburt
11 Joseph C. Liburt
12 *Attorneys for Defendants*

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16 **Attestation Regarding Electronic Signatures**

17 I, Zoya Kovalenko, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other
18 signatories to this document, on whose behalf this filing is submitted, concur in the filing's
19 content and have authorized this filing. I declare under penalty of perjury under the laws of the
20 United States of America that the foregoing is true and correct.

21 Dated: April 17, 2025

22 s/Zoya Kovalenko
Zoya Kovalenko